DOCUMENT RESUME

ED 184 454 HE 012 480

TITLE Wellesley College Case Study for the Sloan Commission on Government and Higher Education.
INSTITUTION Wellesley Coll., Mass.
SPONS AGENCY Sloan Commission on Government and Higher Education, Cambridge, Mass.
PUB DATE 30 Sep 77
NOTE 53p.; For related Sloan Commission documents see HE 012 421-427, HE 012 429-432, HE 012 434-439, HE 012 442-445, HE 012 448-449, HE 012 465-474, HE 012 476-480, HE 482-490.

EDRS PRICE MF01/PC03 Plus Postage.
DESCRIPTORS Academic Records; Affirmative Action; Age Discrimination; Capital Outlay (for Fixed Assets); Case Studies; *Civil Rights; Educational Finance; Federal Aid; Federal Legislation; *Federal Regulation; Government Role; *Government School Relationship; *Higher Education; Institutional Research; Minority Groups; Operating Expenses; Private Colleges; Safety; Self Evaluation (Groups); Sex Discrimination; *Student Financial Aid; Work Environment
IDENTIFIERS *Sloan Commission Studies; *Wellesley College MA

ABSTRACT

The impact of government legislation and regulation on Wellesley College in Massachusetts is analyzed. The impact of federal aid on the economics of the college is considered in terms of capital resources and operating resources. The analysis also considers the effects of government legislation and regulation on capital costs, first-time implementation costs, and continuing operating expenses. The influence of government programs on the character and the philosophy of the college is also considered. Two highly visible areas of college/government relations are student financial aid and civil rights. Civil rights issues include: affirmative action and minority employment, sex discrimination, the Buckley Amendment (student records), age discrimination, and research on human subjects. Other legislation and regulations affecting higher education concern copyrights, the Higher Education General Information Survey, occupational safety and health, tax reform, gifts of stock to colleges, the Comprehensive Employment and Training Act (CETA) program, and fair labor standards. Various college officials' assessments of these issues are presented. (S)

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WELLESLEY COLLEGE

CASE STUDY FOR THE SLOAN COMMISSION

ON

GOVERNMENT AND HIGHER EDUCATION

September 30, 1977

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WELLESLEY COLLEGE

Case Study for Sloan Commission on Government and Higher Education
September 30, 1977

INTRODUCTION

In the spring of 1977, the Sloan Foundation requested that Wellesley College participate, along with about 30 other colleges and universities, in a study of the impact of government legislation and regulations on colleges and universities.

During the summer of 1977, a case study was prepared for the Sloan Foundation. The following pages describe the way the case study was conducted and the observations and conclusions of the study.

DESCRIPTION OF WELLESLEY COLLEGE

Wellesley College is a four-year undergraduate, liberal arts college located in Wellesley, Massachusetts, founded in 1875 for the purpose of providing a high quality education for women. The basic commitment to offer an educational environment which supports women as individuals, as scholars, and as leaders was reaffirmed in 1971 when the decision was made to continue as a college for women only.

The Wellesley student population is a diverse group selected from a wide geographical range. In 1976-77, minority students, not including non-resident aliens, comprised 12.8 percent of approximately 2,000 students. Besides representation from 49 of the 50 states, the student population included 118 foreign citizens and 34 United States citizens living abroad from 51 foreign countries. This year (1977-78) the competitive admissions policy has produced an entering freshman class of which 86 percent were in the top fifth of their high school class. Seventy percent of the freshmen come from public schools.

For the past five years Wellesley College has been able to provide financial aid to all students with demonstrated need. For the current year approximately 40 percent of the students are on aid through funds administered by the College; including funding from external sources, approximately 45 percent of the student body receives financial aid. Of the entering freshmen, 79 percent can be expected to complete their undergraduate careers at Wellesley College and somewhat over 40 percent of the graduates go immediately on to graduate schools, an increasing percentage in professional programs.

The presence of successful, achieving women on a faculty of exceptional teachers and scholars is an important resource in the encouragement of Wellesley undergraduates. Of the 206 full-time faculty members at Wellesley College in 1976-77, 56 percent were women, one of the highest percentages of any nonsectarian college. Seventy-six percent of the Wellesley College faculty have doctorates. Maintaining an over-all student-faculty ratio of 10 to 1, the average class size ranges

from 22 to 25 students.

The Wellesley College campus, located on Lake Waban, spreads over more than 500 acres of woods, hills, and meadowland. In addition to 64 buildings, there are an arboretum, ponds, a golf course, and miles of roads and footpaths. In 1976 a new Science Center was completed to centralize science facilities and to foster interdisciplinary activities among the sciences. Two wings were recently added to the Margaret Clapp Library which houses more than half a million volumes and several rare book collections as well as a language laboratory and computer terminal area. In 1974 the Center for the Study of Women in Higher Education and the Professions was established on the campus to promote research on women's concerns and to provide an additional dimension to the academic education of women. The Jewett Arts Center with its adjacent and newly built foundry and studio spaces not only offers a superb instructional unit for music and art students but also contains a permanent collection of art objects enjoyed by the surrounding communities.

The campus is extended through a cross-registration program with the Massachusetts Institute of Technology which gives students access to the resources of a large urban, research-oriented institution. The Twelve College Exchange Program enables Wellesley students to spend a year or a semester on another campus, and an exchange program begun in 1974 with Spelman College in Atlanta, Georgia, has opened another geographical area to Wellesley students. Opportunities for study abroad include three programs of fellowships for foreign students in Europe, Africa and the Caribbean, as well as exchange programs with the British universities of Sussex and East Anglia. Internships in Los Angeles, Washington, New York and Atlanta supplement local internships in the Boston area, where the newly established Center for Materials Research in Archaeology and Ethnology offer an additional resource for Wellesley students.

The policies of the 37-member Board of Trustees are administered by Barbara W. Newell, tenth president of Wellesley College and tenth woman to serve in this office. Wellesley College has a faculty of about 260 (full and part-time), an administrative staff of approximately 460, and a service staff of approximately 280 members of the Independent Maintenance and Service Employees' Union of America. The total college employment is thus about 1000 persons.

As of June 30, 1976, the total assets of the College had a book value of $146,590,000. The total endowment funds of the College stood at $104,512,213 based on market value (book value: $93,439,632). For the 1977-78 fiscal year the College is operating with a budget of $22,508,000, $263,000 of which is allocated to Physical Plant special projects and instructional capital acquisitions and $200,000 of which has been set aside as a general contingency fund.

Wellesley College maintains for the use of faculty and certain administrative officers a total of 113 housing units (68 apartments and 45 houses) within walking distance of the campus. In addition, the College sponsors a home-purchase and a home-construction plan under which eligible members of the tenured faculty may purchase either College-owned dwellings or College-owned land for home construction or may obtain a mortgage from the College for the purchase or construction of homes near the College. Any of these arrangements may be financed with a low-interest rate loan from the College.

Wellesley College is fortunate in the level of alumnae support. Living Wellesley alumnae number 29,090, and there are 131 active Wellesley clubs in the United States and overseas. One thousand six hundred thirty alumnae from the Classes of 1906 to 1975 attended the Centennial Year Reunion in May of 1976. The percentage of annual alumnae donors remains consistently high: 56.4 percent in 1975-76 and 52.1 percent in 1976-77. Degree-holding alumnae average 58.4 percent in their record of giving.

Wellesley College is based on a tradition of the development of academic excellence and qualities of leadership in women. Throughout changing economic climates the goals of the College have remained constant in support of this tradition. The renewal and expansion of physical facilities, the addition of new programs and curricula, the continuing search for highly qualified faculty members, and the widening affiliations with other institutions of higher learning are all focused on the primary mission of the College, the education of women.

In recent years, the College has been engaged in a number of activities influenced by state, local, and federal legislation. The legislation concerning these activities falls principally into the broad categories of student financing, civil rights, and increasingly, government-financed research and health, safety, and employment.

DESCRIPTION OF PROJECT PROCEDURE

The self-study on the impact of government legislation on Wellesley College had to be conducted in a relatively short time and during a period (Summer 1977) when most faculty members and many administrators were away from the College.

The responsibility for the direction and coordination of the project was assigned to the Vice President for Financial and Business Affairs. He and two of his staff formed a team to organize the study, to collect and analyze the data, and to prepare the final report. An Advisory Committee consisting of nine College faculty and administrators was appointed to review the initial study plan, the analysis of data, the conclusions drawn and the final report. Lists of the three-person study team and the Advisory Committee are contained in Appendix 1.

The study team, in consultation with the Advisory Committee, determined that the data could best be collected and the impact of government legislation best be judged by personal interviews with a broad representation of faculty and administrative staff with particular attention given to those offices and academic disciplines which were known to have felt the influence of legislation and regulations.

The study team first reviewed federal regulations and legislation and prepared a five-page summary of those statutes, executive orders, and regulations which appeared to have some impact on the College. These were grouped under three headings: Civil Rights Legislation/Rulings, Non-Civil Rights Legislation/Rulings, and Regulations and Legislation Relating to Finances and Funding. This legislative summary was reviewed with the Advisory Committee and, after appropriate adjustments, was prepared for distribution to faculty and administrative staff to be interviewed.

Representative office and department heads were also sent a questionnaire which asked them to identify legislation with direct and indirect effects on their areas and to quantify those effects where possible in terms of time, money, and programs. They were also asked to evaluate compliance procedures and the general effectiveness of the relevant legislation.

Copies of the legislative summary and the questionnaire, along with the cover letter to those to be interviewed, are contained in Appendix 2.

Then, again in consultation with the Advisory Committee, the persons to be interviewed were selected. A representative sample of those who would have first-hand knowledge of the effects of legislation and regulations on the College were chosen. A list of the participants in the project interviews is contained in Appendix 3.

Finally, the project, procedure, the material to be distributed, and the final list of participants were approved by the full Advisory Committee. Materials were then mailed to each participant and appointments made for an interview with one of the three-person study team.

The team conducted interviews during July and August and drafted summaries which were sent to the interviewees for editing and approval. All of the approved interviews were read by each of the team members. The material was synthesized and analyzed by the team and a first draft report prepared. The original draft was then reviewed with the President's staff and with the full Advisory Committee. On the basis of this review, a final draft was prepared and approved by the Committee and the President for forwarding to the Sloan Foundation on September 30, 1977.

ORGANIZATION OF THE REPORT

The report attempts to measure the impact of government legislation and regulations on Wellesley College from two different points of view. The first section of the report deals entirely with the impact on the economics of the College. A summary of the resources provided through government funding is presented: first, in terms of capital resources and second, in terms of operating resources. Then an assessment is made of the effects of government legislation and regulations on capital costs, first-time implementation costs, and continuing operating expenses.

The second section of the report attempts to capture the influence of government programs on the character and the philosophy of the College with respect to three general categories of legislation: legislation relating to student financial aid, civil rights legislation, and legislation other than civil rights.

Finally the report comes to the major conclusions and recommendations drawn from the materials produced by the study.

IMPACT OF GOVERNMENT LEGISLATION AND REGULATIONS ON THE ECONOMICS OF THE COLLEGE

The impact of legislation and regulations on the economics of the College has to be measured in two different ways: first in terms of funding provided by the government and, second, in terms of the costs of meeting the requirements of legislation. Both have an important influence on College finances. It can be misleading to consider resources separately from costs. Each need to be considered in the context of the other.

Since resources provided by the government far exceed the costs of compliance, perhaps it is appropriate to look at these first.

SUMMARY OF RESOURCES PROVIDED BY THE GOVERNMENT

Resources provided by government break down into separate distinct categories. The first category is capital resources: funds to finance specific capital needs, usually in the form of buildings and/or equipment. Wellesley College activity in this area has not been heavy largely because of a demonstrated reluctance of the College to accept this kind of government funding in the 60's when it was most available. There are, however, several instances, most of them recent, of government funding of capital projects.

In 1976-77, the College received a computer acquisition grant from the National Science Foundation amounting to $246,000.

In early fiscal year 1977-78, the College received a loan reservation for $475,000 resulting from a loan application to the Department of Housing and Urban Development for energy conservation remodeling projects in the College dormitories.

In the past three years, the College has received about $52,000 in equipment grants, mostly for scientific equipment, from a variety of government agencies.

In 1959, the College received a $1,000,000 35 year loan from HUD under the dormitory construction program to help fund the building of a new dormitory. The loan was paid off in ten years (further evidence of the College's uneasiness with reference to capital funding by the government).

The second category of government funding is annual operating support. Operating support comes largely in the areas of student financial aid and research grants. The former is much the larger.

Student financial aid from government sources has enabled the College to continue to provide aid to all of its students requesting aid without having to resort to the use of tuition money. The College position is expressed in the interview with the College's Budget Officer.

> "The government participation in student financial aid is much more direct, perhaps, than in any other area. It would be possible for the College to have a commitment to student financial aid, but if funding were not available, the commitment would be meaningless. At Wellesley it has always been traditional not to use student tuition money to support student financial aid. The College has been able, up until now, to offer entrance to any student who meets its admission standards and to provide the necessary financial aid to support the student without using tuition income. The resources of the College have been sufficient to handle this, including the use of government funding. It would not be possible to accomplish this without government aid, and as a matter of fact, it may not be possible for the College to continue this position for too much longer if increases in student financial aid continue at past years' rates. But, it would have ended long ago if the College had not been able to obtain government grants, loans, and work/study funds to support student financial aid."

Student financial aid from government sources budgeted for 1977-78 breaks down as follows:

Grants -	
Basic Educational Opportunity Grants	$180,000
Supplemental Educational Opportunity Grants	140,000

Loans -	
National Direct Student Loans	99,000
Wellesley Insured Student Loans (funded by loan from Student Loan Marketing Association)	658,000
Federal work/study	186,000
	$1,263,000

Research grants to faculty of the College have been increasing steadily in recent years. In 1976-77, government sponsored research expenditures came to $206,000. Research awards in the same period were $423,000. While this is not a significant portion of the College's budget (less than 2%), it represents a considerable increase from 15 to 20 years ago when sponsored research funds were virtually non-existent. Further, the research outlook of the faculty has changed. As noted by the Science Center Director in her interview:

> "The Science Center Director feels that the growth of research funding is likely to increase slightly in the future. The new science facility which makes new equipment and up-to-date laboratories available increases the possibility of this growth. Past growth of research has clearly changed the character of the institution. Generally, it may be said of the science faculty that if they do not do research, they can't expect to stay at the College. This was not the case 20 years ago."

It is clear from the above statistics and comments that while Wellesley is far from dependent on government support, there is a significant government impact on College revenues. Over all, the College is estimated to receive between $1,500,000 and $1,750,000 in annual operating support from the government.

This does not include a grant received within the past few weeks from the National Endowment for the Humanities amounting to $360,000. The College must match these funds over a three-year period on a 3-to-1 matching basis.

COSTS OF COMPLIANCE

It needs to be said firmly and clearly at the outset of this section that cost data concerning the effects of legislation cannot be determined with precise accuracy. There is too much cost calculation that has to be based on the speculation of what might have been if the legislation had never been enacted. There is too much dependent on the measurement of time in terms of dollars, a measure always endowed with a vagueness not associated with hard, out-of-pocket dollars. There is too much

ambiguity about the assignment to legislation of costs which could have been incurred or, at least, should have been incurred without any legislation at all. And the above examples far from exhaust the list of imprecisions.

But for all the disclaimers about preciseness in the measurement of costs, it is still possible and certainly well within the span of common sense to make a reasonable approximation of the dollar impact of legislation. And, with all the reservations about accuracy, it is still useful to have a general estimate of the costs of implementation of programs and the costs of continuing compliance so that these can be compared to the College's total budget.

CAPITAL COSTS

In this report, we will segregate costs brought about by legislation into three general areas, each with different characteristics. The first of these is capital cost: the cost of alterations of buildings and/or equipment, the acquisition of special equipment, and the incorporation of building and/or equipment requirements into new construction. Most of the capital cost items related to legislation will come through the Occupational Safety and Health Act, similar Commonwealth of Massachusetts legislation, environmental protection legislation, and legislation covering facilities for the handicapped.

Over the past several years (determination of what time period should be measured is one of the imprecisions of cost estimates), the College has incurred considerable capital cost of this nature. The new Science Building was completed within the past year. The design of the building provides facilities for handicapped students and employees. The Director of the Science Center estimates that these facilities increased the cost of the building by about 1% or $150,000. Added to this are the safety provisions required by OSHA although it is likely these would have been provided with or without legislation.

If the same estimates are applied to the recent Library addition and the remodeling of Pendleton Hall, one of the College's academic buildings, where the building standards and requirements for handicapped are the same, an additional $70,000 is added. It is known that modifications to elevators and lavatories in Pendleton to meet handicapped requirements came to $21,000.

In 1976-77, modifications to power plant stacks to reduce air pollution and effluent testing carried out in connection with Environmental Protection Agency requirements amounted to nearly $26,000.

Finally, a direct product of Title IX of the Education Amendment of 1972 is a need to make more dressing room facilities available for male faculty and staff. This work will be done shortly at an estimated cost of about $8,000.

Thus, in the past few years, it is estimated that capital requirements mandated by government came to over a quarter of a million dollars.

FIRST TIME IMPLEMENTATION COSTS

The second area of costs brought about by government legislation is the cost of first-time implementation of programs. Again, we have attempted to measure this cost over the past several years.

Most of this cost has been derived from the requirements of civil rights legislation, specifically Executive Order 11246 and Revised Order 4 (Affirmative Action), Title IX, and Family Educational Rights and Privacy Act (Buckley Amendment). Affirmative Action expense is a mixture of legal fees, consultants' fees, and faculty and administrative time spent in getting the program in place. The same pattern holds for Title IX and, to a lesser extent, for the Buckley Amendment. Added to these expenses is one formidable item brought about by the Equal Pay Act. The equal-pay-for-equal-work mandate resulted in the necessity of establishing a single job description for custodians in place of the separate job descriptions for matrons and custodians in 1975. The former matrons were given back pay to bring their rate of pay up to that of custodian, since the differences in the two job descriptions were not deemed to be sufficient for

separate pay scales. The cost to the College: $63,000.

In total, the costs of first-time implementation since 1974 can be summarized as follows:

Attorneys' and consultants' fees	$44,000
Staff working time	19,000
Back pay for matrons	63,000
	$126,000

While these first-time implementation costs will not be duplicated in the same form for the same programs, there undoubtedly will be other one-time costs brought about by new programs and by a variety of government audits and monitoring procedures.

For example, negotiations are presently in process with the Internal Revenue Service over the question of faculty compensation in the form of housing subsidies. Legal fees and administrative time have not been large so far, but the process is just beginning and has the earmarks of a long and perhaps costly debate. The IRS has also recently expressed an interest in unrelated business income of the College.

CONTINUING OPERATING EXPENSE OF COMPLIANCE

The third and final area of legislative costs - and probably the most important one - is the continuing operating expense of compliance. This runs the whole gamut of administrative requirements derived from legislation - from Affirmative Action, to IRS returns, to the Fair Labor Standards Act, to OSHA, to EPA standards, to Social Security, to ERISA, to many more, plus legal fees, administrative and consulting fees, operation of safety programs, financial aid programs, government reports, government audits and a number of other cost elements. We reviewed continuing costs with each participant in the study and have arrived at a cost estimate which we believe is reasonably accurate, given the inherent imprecision in any such estimate. It is indicative of the economic impact of legislation on the College.

A few excerpts from the interview summaries may give a feeling for the basis of the estimates.

From the Controller:

"The Controller estimates that the various federal and some state payroll regulations, including Social Security and income tax withholding provisions, require one additional full-time person to meet the requirements. Administrative matters relative to regulations require an additional half-time person. Handling matters related to student financial aid in the Bursar's Office requires an

estimated two persons to handle loans, a quarter-time person to cover administration, and perhaps another half-time person to deal with grants. Accounting for research, grants, and contracts requires an estimated one-half time person in the Controller's Office. The Controller himself spends approximately 13% of his time on matters pertaining to the Internal Revenue Service, HEGIS, ERISA, and the work/study program. In summary, the Controller's and Bursar's Offices require approximately five people at a total cost of about $40,000 to deal with government regulations, filing of government forms, and other compliance requirements. There are approximately twenty people in the Accounting and Bursar's Offices; therefore, about 20% of the Accounting Departmen's time is spent dealing with government regulations and compliance requirements."

From the Director of Physical Plant:

"The Occupational Safety and Health Act of 1970 has resulted in one additional employee whose full-time job it is to oversee the areas of safety and health standards. The costs are probably the salary cost of the employee and an equal amount in related expenses."

From the Personnel Director:

"According to the Personnel Director, the Personnel Office is affected by at least nineteen of the twenty-eightfederal actions listed in the legislative summary prepared by the Business Affairs Office. The heavy involvement, of course, is with civil rights legislation and the entire office is affected by this legislation, at least indirectly."

From the Financial Aid Officer:

"The amount of work in the Financial Aid Office during these years has grown and grown and grown. The Financial Aid Officer estimates that she would have to spend two to three days simply to list the reports required from her office. Without federal money, we would have fewer students on aid, and the Financial Aid Officer thinks she could cut her staff by two FTE members. She needs one full-time clerk just to do the paperwork."

From the Physical Plant Director:

"Perhaps the greatest impact of federal legislation on the Physical Plant Department comes from the EPA. The Environmental Protection Agency is federally funded and requires that the state formulate and implement plans and programs for regulation of air and water pollution. The over-all objectives of the EPA are good, but there has not been enough consideration of financial impact on colleges and universities in complying with EPA requirements. The Director of Physical Plant contends that the colleges need flexibility in spreading out the time of compliance. Costs to the College include the requirement that we monitor and test the Steam Plant effluents and that we burn the more costly low-sulphur fuel at an additional cost of approximately $50,000 a year."

From the Coordinator of Student Services:

"Affirmative action recruitment costs have been increased because the departments have done their own recruiting. All staff have been actively involved, and search procedures have been more elaborate and time consuming. Students have participated as well and have received affirmative action education. The Coordinator of Student Services estimates the time involved has been equivalent to one full-time staff person on a 35-hour week for the academic year. In addition, a significant amount has been spent on travel, postage and stationery and a minimum of at least $200 in telephone calls."

From the Budget Officer:

"The Budget Officer estimates that it probably takes about ten percent of her time to handle the various effects of government legislation and regulations on budget computations, so the over-all impact is not great but there is a definite effect."

From the Vice President for Financial and Business Affairs:

"There is a considerable flow of government information through this office. The Vice President for Financial and Business Affairs is responsible for

reading, digesting, and ultimately implementing a significant amount of federal legislation. This is currently the case with the Architectural Barrier Act of 1968 and Section 504 of the Rehabilitation Act of 1973, and there are continuing demands on his time in such areas as workmen's compensation, pension plans, affirmative action, I.R.S. regulations (presently focused on faculty housing), etc. He estimates that 25% of his time is devoted to work directly related to federal and other government legislation. In addition, the Assistant to the Vice President spends approximately the same amount of time in such activities. It is the Vice President's belief that without the need to comply with federal regulations, he would not need a full-time assistant. Although the College would be involved in affirmative action, pension plans, and certain other programs without the pressures of federal authority, the Vice President for Financial and Business Affairs cites a difference in documentation directly attributable to government intervention."

From the Chairman of the Physical Education Department:

"The Physical Education Department now advertises in black journals and other minority magazines, and the Department Chairman estimates the cost at a minimum of $50 to $70 per opening, perhaps higher if the openings occur at different times. An additional $100 in mailing costs and $50 in telephone costs are absorbed in the departmental budget."

From the Dean of the College:

"The College has had to put in a considerable amount of time forming search committees and complying with the general terms of civil rights legislation. The Dean estimates that there have been an average of 16 search committees per year with approximately five people serving on each search committee. . Again, as noted earlier, perhaps it is not fair to say that all this time can be charged directly to regulations. It is hard to pin down how much would have been standard College procedure."

At the time affirmative action procedures were being instituted, the College was also extending its searches to cover a national area. This combination coupled with the College's continuing

effort to increase minorities on the faculty regardless of government requirements, makes any estimate of cost of compliance to civil rights legislation very vague and imprecise. The continuing cost of compliance is not large.

The estimated annual continuing costs of complying with government legislation and regulations can be summarized as follows:

Academic Affairs	$10,000
Accounting	40,000
Admissions	12,000
Budget Office	2,000
Career Services	2,000
College Relations	5,000
Financial Aid	22,000
Legal	5,000
Pension Administration	6,000
Personnel	23,000
Physical Plant	68,000
President and Dean	12,000
Registrar	1,000
Student Services	15,000
Vice President for Business and Financial Affairs	15,000
Women's Center	5,000
Staff Benefits	35,000
Total	278,000

While $278,000 annual expense is not insignificant, it should be viewed in the context of the total operating budget. For the current fiscal year, the College's operating budget is nearly $23,000,000. Expenses for compliance with government mandated programs, therefore, comes to 1.2% of total expenditures, a factor - but not an overwhelming factor - in the College budget.

Expense also should be viewed in relation to resources derived from the government. A previous section of this report noted that annual operating support received from the government comes to between $1,500,000 and $1,750,000 annually or about 7% of the budget as compared to 1.2% of budget for compliance expense. Resources exceed expenses by a ratio of nearly 6 to 1.

UNEMPLOYMENT COMPENSATION

A few short paragraphs should be given to the special case of unemployment compensation, a cost element in a somewhat different category from the others addressed in this report.

In January of 1972, nonprofit organizations, including hospitals and public and private institutions of higher education, became subject to the unemployment compensation provisions of their

states as a result of federal unemployment tax legislation passed in 1970.

These nonprofit organizations were permitted to elect a direct reimbursement method of payment or a tax contribution method, an option not open to organizations previously subject to this legislation. The direct reimbursement method of payment has generally been less costly than the tax method, especially for institutions with year-round programs.

For institutions which employ seasonal employees, as Wellesley College does, the cost savings have not been so dramatic. Although faculty members who have contracts for the following academic year may not receive unemployment benefits during the summer when the College is not in session, no such exclusion exists for non-academic employees. This means that custodians and kitchen workers hired for the academic year collect unemployment benefits at the College's expense whenever they are not scheduled to work for periods longer than one week.

With kitchens and dormitories closed for three summer months and with reduced operation during the winter break period, the financial impact for Wellesley College is serious. Annual expenditures for unemployment compensation exceed $150,000. There is at least a question to be raised concerning the equity and justice of making unemployment payments during periods when the College is not in session to employees who have knowingly accepted seasonal employment. Such payments account for approximately 75% of the College's unemployment compensation expense.

The legislative intent to assist people unexpectedly out of work would seem to be subverted by the present construction of the unemployment compensation law, and colleges such as Wellesley are having to bear the expense.

IMPACT OF GOVERNMENT LEGISLATION AND REGULATIONS ON THE CHARACTER OF THE COLLEGE

Thus far we have examined only the impact of government on the income and expenditures of the College. Perhaps, even more important is the impact of government on the attitudes and character of the College.

Required expenditures, of course, do influence the setting of campus priorities and programs and therefore, in themselves, have an effect on the character of the College. However, knowledge and understanding of the budget impact of payroll regulations, Internal Revenue Service requirements, unemployment compensation, social security, and safety codes are limited within the College community so that comparatively little community discussion about these items has been forthcoming in the interviews with faculty and staff not directly connected with them.

Two areas of College/government relations are highly visible: 1) financial aid to students and 2) civil rights actions and enforcement. Discussion of the effects of government action on the character of the College has thus tended to focus on these two subjects. It should be noted that the broad interest in these topics derives from the deep concern about them and puts them high on the list of important relationships between College and government.

As a footnote to assist in the interpretation of comments about civil rights, it should be known that Wellesley, at the time affirmative action programs were inaugurated, had little or no experience in organized search procedures and very limited personnel service. Despite these limitations, minority employment at the College rose from virtually nothing to 6.3% for full-time noninstructional employees and 7.0% for full-time faculty by 1976.

Following the two major sources of interaction are a variety of government actions, rulings, procedures, and decisions which touch the College in a variety of ways and which have given rise to an equal variety of attitudes, opinions, and assessments about the government activity.

GOVERNMENT FINANCING OF STUDENT AID

The greatest impact of government legislation on the College's operations is in the area of financial aid. Certainly, the make-up of the student body has changed dramatically over the past 25 years. Government aid to students has played some part in this. This comes through strongly in the interviews. Some excerpts follow.

From the President:

> "In the President's opinion, financial aid programs of the federal government have been tremendously helpful to colleges. Many independent colleges probably could not have survived without it, or at least, could not have survived and still maintained the broad diversity of students characteristic of college populations today. The President agreed that Wellesley College probably could have survived without government financial aid to students because of the strength of its resources, but she acknowledges that the profile of the College would have been vastly different, with a severely limited mixture of students consisting mainly of those from the upper economic levels of society. The College would have been, in short, an anachronism, a throw-back to the 1920's, completely out of the context of today's social environment."

From the Financial Aid Officer:

"The Financial Aid Officer is enthusiastic about the support we receive from federal funds and, in fact, does not see how colleges can survive without federal money. In accepting federal funds, she considers the federal government as she would any other donor whose wishes must be honored, and she is prepared to adhere to all regulations.

"The impact has been enormous since 1971 when federal funds began to increase at Wellesley. Almost every area of the Wellesley financial aid program has been affected. Every form from the application process through the award process has been changed, as well as every procedure. There has even been an impact on the personal lives of the staff. The federal calendar and the federal deadlines dictate the personal calendar of the staff and, of course, their families. In 1970-71, a student financial aid application consisted of two forms. For 1977-78 there were nine. In 1970-71 the award letter had two very simple parts. In 1977-78 there were ten.

"Although the paper work and pressure have increased, there has been a corresponding increase in benefits. The Financial Aid Officer believes that philosophically Wellesley College would have gone in the same direction without government legislation but that federal funds have been important in meeting our social goals. In some areas of the country she thinks the goals would never have been achieved without legislation.

"The Financial Aid Officer believes that financial aid money has had an impact on the composition of the student body and that we would have had little social diversity without federal funds. In turn, the quality of life on campus has been influenced. She points out that work-study money has taken students into the community and has changed the community concept of our students, who are seen as bright, independent, creative persons. The Massachusetts Scholarship Office Director commends Wellesley students as young people who really work. This, she believes, has led to a change in people's perception of the image of the College in general.

"The Financial Aid Officer has consulted for HEW and is aware that not all schools keep good records or are honest. From necessity the federal government pushes institutions to keep good records. This she sees as a by-product of federal funding.

"At Wellesley, as at most institutions, federal funds influenced changing our refund policy, eliminating an academic cut-off for financial aid, and influenced re-examining policies for equity and fairness.

"The Financial Aid Officer recommends, however that federal funds be made available for less-than-half-time students, a group with an unmet but real need for financial aid. She also would like to see students' "choice" of an independent college supported by an increase in grant appropriations in the Supplementary Educational Opportunity Grants program."

From the Political Science Department:

"The Chairman is a strong believer in government financial aid to students and believes that it has enabled the College to bring about diversification in the student body which would have been impossible otherwise. He noted that if Wellesley can't have a diverse student body without government financial aid, nobody can. This comment refers to the superior resources for the support of students that Wellesley has in comparison with most other colleges."

From the Resources Office:

"Both the former and the current Vice President for Resources agree that the College could not possibly carry the current broad representation of students from varying economic and social backgrounds and varying racial backgrounds without extensive financial aid. In that sense, government assistance is essential to maintain financial aid at the current level. Both agreed that student aid is perhaps the most important and most successful benefit that Wellesley receives from the federal government, and the College could not exist in its present form without it."

There were, however, some specific concerns expressed about student aid.

From the President's Office:

"The President expressed some concern that federal student aid programs seem to be turning more toward loans to students rather than grants. This trend

could lead to fewer students receiving sufficient and satisfactory college financial aid and a consequent drop in enrollment. It also creates a bias against low income students. The burden of repayment of loans is unevenly borne after graduation."

From the Resources Office:

"There is great concern in the Resources Office about educational financing assistance for the middle-income group. Public policy has thus far not considered the middle-income people and their ability to finance private education. There have been no government provisions for assistance programs. This seems to be a gap in public policy and it could have a serious effect on Wellesley College and similar colleges as tuition goes up. There is no indication that the trend of rising tuition and fees is likely to be abated in the near future."

CIVIL RIGHTS LEGISLATION

1. AFFIRMATIVE ACTION AND MINORITY EMPLOYMENT

Most of the faculty and staff did have an opinion and an assessment of the impact of civil rights legislation on the College. A representative sampling of those assessments covering the range of attitudes follows:

From the Office of the Dean of the College:

"She notes that Wellesley does not really have much trouble with having adequate numbers of women faculty candidates (except in the sciences where there has been a problem of getting qualified women applicants in recent months) or with proper representation of women on the faculty (Wellesley has a majority of women on the faculty). Nor is there a salary gap between men and women faculty members at Wellesley. However, Wellesley continues to have to make an effort to increase the number of minorities on the College faculty. The Dean believes that, at present, this does not present a particular problem. It is the intention of enough of the current faculty to get sufficient minorities on the faculty ranks so that now minorities are given fullest consideration. There are enough faculty members who believe in this purpose so that less than honest efforts would be

unacceptable to the faculty as a whole. The Dean indicates that of the faculty appointments made this year, based on the selection of the best qualified candidates, in at least one or two cases, the appointees have just happened to be black.

"Civil rights legislation has given the Dean a firm basis for inaugurating broader searches for personnel, and this has brought about a bonus, perhaps not entirely unexpected. The broader searches not only delivered more minority candidates, they also turned up many other qualified candidates from other areas of the country and from a wider range of institutions and have, therefore diversified the number of candidates, minority or otherwise, which the College has to choose from."

From academic departments:

Political Science:

"With regard to affirmative action and other civil rights legislation, the chairman reports that compliance with these regulations has caused a change from former procedures and a greater effort to recruit minority candidates than in the past. The procedures for recruiting minority candidates this past year were somewhat complex, involving a review of blacks receiving doctoral degrees in the Political Science field who were listed in a handbook of black graduate students, and an assessment of the possibility of their being potential faculty candidates. But in spite of comparatively elaborate procedures, the results were not very successful. Viewed from the effects on faculty and administrative time, the impact was not major. The procedure did not take a great amount of time (approximately ten hours of faculty time for the whole review), but as reported, the time spent was unproductive since the procedure was only marginally effective. The main problem, in the chairman's opinion, is not that people don't want to hire minorities but that there are so few available. A year ago the College got into a bidding war with Brandeis, which was eventually lost. This kind of activity is both annoying and discouraging to the people who are involved. However, the chairman does concede

that affirmative action has made the College look at people whom it perhaps would not have looked at otherwise and has, therefore, kept the department continually aware of the need to increase the employment of minorities and to continue an intensive effort.

"The chairman thinks that federal legislation has only been incidental in bringing about the change in Wellesley's minority employment. Wellesley has been looking for minority faculty since 1970, but federal legislation has forced this issue only in the past couple of years. Federal legislation, however, has been an added incentive to search for minority candidates."

Economics:

"The department for the first time last year set up a search committee in the hiring of new faculty, but this was the direct result of College legislation rather than federal authority. Affirmative action legislation has a cost (unspecified) in terms of time, telephone expenses, etc. However, the chairman views the addition of minorities to our staff as being primarily the outcome of social pressures rather than affirmative action."

From administrative offices:

Resources:

"With respect to civil rights legislation, the outgoing Vice President for Resources reports that the Resources Office has had a pretty good record in the employment of minorities and that federal regulations have had very little influence on the policy. In the Resources Office, there has been intense interest for a long time in getting a larger representation of minorities on the staff. The difficulty has not been with federal regulations but rather with locating well-qualified minorities. Both the outgoing Vice President for Resources and the incoming Vice President for Resources report that well-qualified minorities are hard to find. Both find that there is considerable hypocrisy involved in compliance with federal regulations on employment of minorities and that there ought to be ways in which

the College or any other employer can cut through this. Government regulations make it necessary to set up many procedures. Employing offices then go through elaborate compliance pretending to be fair, but it is very easy to conform to all the procedures and still evade the intent of the regulations. Too often, strict observance of the procedures does not accomplish what the regulations are set up to accomplish, that is, the employment of minorities. Both men believe that the Wellesley Resources Office would see to it that minorities are represented without having to set up all the machinery of government regulations."

Because Wellesley College has a highly trained alumnae population, the Office of Career Services has become a national resource for the affirmative action program of others. Therefore, this office brings experience with others as well as the College to bear on some of these problems.

Similar thoughts to those of the Resources Office were expressed by the

Office of Career Services:

"While believing in the principles of affirmative action, the Director expressed concern over what she termed the "rigamarole" involved in following affirmative action at Wellesley College. In her opinion, the procedures are not clear, the record keeping is difficult, and the guidance from the Personnel Office leaves something to be desired. One other aspect of the affirmative action program which affects the Career Services Office is the number of job notices which arrive at the College. She feels that many of them are "wired" but they require a great deal of time to process. The added work on the basis of about one-third more job notices arriving annually amounts to about five to ten hours a week during the academic year of additional processing time required."

From a slightly different approach, the Personnel Office found some of the same problems.

"The Personnel Director would like to see a clarification of acceptable methods of acquiring information on race and sex. She also notes a blurring of required and recommended actions for compliance

with federal regulations and some difficulty with employment categories on reporting forms. Because of unwieldy and often conflicting rules and regulations, the Director, while expressing a strong commitment to the goals of this legislation, feels that a critical review of federal civil rights legislation is in order."

2. TITLE IX - SEX DISCRIMINATION

Wellesley, as a college dedicated to women's education, applauded the assurance of the equal treatment of women inaugurated by Title IX but the effect was minimal at Wellesley where Title IX principally affects employment only. Consequently, there were few comments concerning Title IX as such. There were some tangential questions raised about Wellesley's status as a single-sex institution and some of the consequences and concerns about that status. Most of these had to do with Commonwealth of Massachusetts legislation and regulations. Comments follow from the Chairman of the Board of Trustees, the Resources Office, and the Director of the Science Center.

From the Chairman of the Board of Trustees:

"The Chairman of the Board of Trustees did point out one particular piece of State legislation that specifically caused the discontinuance of Wellesley's graduate program. While the laws of the Commonwealth of Massachusetts permit a single-sex institution to provide undergraduate education, graduate programs must be provided for both men and women. Under these circumstances, Wellesley dropped its graduate program. This is one example of a change caused entirely by government action."

From the Resources Office:

"One concern which was brought up by the Resources officers was the question of co-education. Alumnae feel strongly about maintaining the College as a women's college. There has been government influence in this area, and in fact, the College dropped its graduate program because Massachusetts law required that all graduate programs be made available to both men and women. So far, undergraduate programs have not been affected, but there is a potential danger."

From the Director of the Science Center:

"The Science Center Director also mentioned the loss of the Master's Program which came about because the Commonwealth of Massachusetts requires that graduate work be provided for both men and women. The Director thinks this has been a definite loss to the College and represents one of the specific cases where legislation has had a detrimental effect on the College operations."

3. THE BUCKLEY AMENDMENT

The Buckley Amendment is another area of civil rights legislation which received considerable comment.

From the Director of Admissions:

"The Buckley Amendment, in her opinion, has eliminated the flexibility in private institutions in an attempt to right a wrong which existed chiefly at the secondary level of education. The initial impact of the Buckley Amendment on Wellesley College was great, the on-going cost less. It is necessary that a member of the department sit in with a student who wishes to examine her records. This takes about twenty minutes each time a student comes in for this purpose. The first year there were thirty-five to forty students who took advantage of this procedure, and during the second year there were ten to fifteen students who did so. In addition to the problems involved with establishing College guidelines for compliance with the Buckley Amendment, there were problems in interpretation of the Amendment before the HEW guidelines were issued. This resulted in many conferences with the College lawyers and the Dean's Office and some readjustment because of changes when the HEW guidelines came out.

"While supporting the intent of the Amendment as it affects secondary schools, the Director feels that the problems inherent in its application to undergraduate institutions can lead to mistakes in selection for admissions as well as mistakes in selection of candidates for employment because one side effect of the Amendment has been its use as an excuse for not giving information regarding candidates for either employment or admission. Evidently many sources of reference

information have refused to give any meaningful information regarding candidates because of the Buckley Amendment.

"In the opinion of the Director, had professional societies been consulted first, private institutions of higher education would not have been included in the provisions of the Amendment."

From the Office of the Dean of the College:

"The Associate Dean agrees with the aims of the Buckley Amendment but thinks the actual legislation was very poorly conceived. Knowing that a recommendation she receives for a student is accessible to the student seriously undercuts its validity. In addition, writing a recommendation on behalf of a student who will also read it tends to inhibit candor."

From the Dean of Academic Programs:

"The Buckley Amendment has had major impact on the Dean's Office. During the first year, 1974-75, the heads of major record-keeping offices spent incalculable hours gathering information on how student records are kept. This was a difficult undertaking, given the number of different offices and departments which keep student records, including student organizations. According to the Dean, the principles behind the Buckley Amendment are admirable. The idea that a person may have access to records in order to correct errors and also the idea of protecting the privacy of those records are fine. Much of the difficulty comes from the fact that the Amendment was originally intended to apply to schools, not colleges. Wellesley College has long adhered to the American Association of Collegiate Registrars and Admissions Officers' guidelines on privacy so that this was not new to the College. The student access to letters of recommendation, however, has been difficult, and in the opinion of the Dean, the effect of the legislation has been negative, that is, very small gains for an enormous amount of work."

From the Registrar:

"In practice, the students have been relatively uninterested in checking their records. Basically they know what their folders contain, primarily carbons of letters that were sent to them. With more interest, of course, more staff time would have been involved. To comply absolutely with the requirements of the legislation, we should be keeping a record of all of the requests for transcripts, that is, logging them in and out. This would probably require another staff person, and this we do not do.

"The Registrar does not see merit in the Buckley Amendment in relation to institutions of higher education. For secondary education it carries some value; no child should bear a stigma from kindergarten through to high school graduation. Although she likes the statement on transcripts which guards against indiscriminate third-party dissemination, she views the Buckley Amendment as a clarification of what responsible colleges were already doing. She does think that the Amendment makes a great deal of difference in references."

From the Director of Career Services:

"The Director feels that students should not waive their rights for access to the file in general but should be permitted to waive their rights in particular instances. From her standpoint, a person who cannot give a favorable reference should indicate this to the student requesting it and suggest that the student ask another person. The Director also objects to the practice of some schools, notably law schools, who ask to see only confidential records. She feels that this practice obstructs the intent of the Buckley Amendment and should not be permitted. On the whole, she sees positive results from this amendment."

4. AGE DISCRIMINATION

The question of age discrimination drew a few comments.

From the Dean of the College:

"Age discrimination is a worrisome factor and may

become more worrisome when and if Congress increases the mandatory retirement age to 70. This perhaps would present some problems for Wellesley. The College has a large turnover of younger faculty at present. If Congress were to extend the mandatory retirement age to 70, this problem could become even more concentrated."

From Student Services:

"The Coordinator believes that we are becoming more conscious of the varieties of age discrimination. She is aware of a subtle kind of discrimination that comes into play where there are few routes for internal promotion and where the opportunity to became professionally trained is limited. She also pointed out as a form of age discrimination, the fact that new salaries tend to keep pace with the market while the salaries of continuing personnel do not. She thinks there is a tendency to hire younger persons in Student Services in an effort to find staff who relate easily to students. The Coordinator is generally concerned about expanding retirement options. She fears the proposed later retirement age may result in a further decrease in personnel turnover. On the other hand, she is also concerned for those persons who are forced to retire at an arbitrary age or whose desire to retire at an earlier age is restricted by financial considerations. She would like to see a workable economic base to allow for greater career flexibility irrespective of age."

From Biology:

"The Chairman sees an element of age discrimination in the age distributions on which tenure decisions and hires are based, but this is variable. Older, more experienced people cost more money, and the College does not prefer them. The junior faculty does not want them because they become eligible for tenure slots after two years at the College. In that age may limit one's future in the department, consideration of the fact is not necessarily detrimental to the applicant."

5. RESEARCH ON HUMAN SUBJECTS

There were a number of observations on this subject. A few samples encompass the general opinions expressed.

From the Center for Research on Women:

"The regulations for research on human subjects have caused numerous problems for the Center. At the governmental level, the guidelines are not clear and a great deal is left to the determination of the campus committee. Instead of guidelines, the government has mandated the composition of the committee, e.g., one ethnicist, one medical person. On the Wellesley campus the persons who fill these slots tend to be either not interested or to have done no empirical research. At the committee level, it is hard to find committee members and to get them to act, as when a signature is needed by a specified date. The procedure is simply not sufficiently put together to be useful and results in a considerable cost in time. An additional problem is the lack of guidance from the committee regarding how much protection of subjects is needed. In the absence of guidance, researchers often engage in overkill, unduly constraining their research to safeguard privacy. This costs time and money, but more serious is the research cost in denying researchers the use of data, such as the age of interviewees, which can affect the usefulness of the data. Although the Director accepts the basic premise of the regulations, she thinks that the College has a Human Subjects Committee only to comply with these regulations; the Committee does not function for foundation grants. Given the fact that the Committee is viewed as a formality, the tendency is to (1) get away with as much as possible or (2) overkill. Neither is a good solution."

From Biology:

"The Chairman has had considerable difficulty with the human subjects legislation. She has been unable to get legal advice on how to comply when using students as subjects. The department often takes blood pressure, checks the respiration and heart rate of students after mild exercise on a bicycle, and pricks fingers for blood. In particular, it needs guidance for physiology and human biology courses. There has been no response from the administration on what is legally covered and what is not covered. One faculty member has been calling the College lawyer for about a year to learn what are our responsibilities.

Laboratory activities do not go through the College committee but only through the department committee. The department is 'floundering for direction'."

From Student Services:

"There has been some difficulty in obtaining an official policy statement on the use of human subjects in campus programs or residence hall activities. The spouse of a Head of House, a psychologist and licensed professional person, was asked to do a student-initiated program on hypnosis in one of the residence halls. The Director consulted the appropriate committee and was told that they have nothing to do with any policy-making outside of classroom activities. There is a lack of continuity between the academic and non-academic in this area."

GENERAL ASSESSMENT OF CIVIL RIGHTS LEGISLATION AND ITS IMPACT ON THE COLLEGE

Many of those interviewed gave a general overview of the effects of civil rights legislation on the College. A few examples will express the general feeling and the College's philosophy about such legislation.

First, from the Chairman of the Board of Trustees:

"The Chairman expressed his opinion that social legislation largely reflects the temper of the times and that Wellesley College had already made considerable progress toward making social changes prior to the legislation. In other words, federal legislation was largely a product of social forces, as were many of the changes which occurred at Wellesley College in the past ten to twenty years. The actions of the College were not mandated by federal legislation so much as they were brought about by social forces such as the black students' movement and the women's liberation movement working from within the College. It is true that federal legislation undoubtedly speeded up the process of social change and brought about faster implementation of regulations surrounding the change, but the legislation itself was more an effect than a cause."

From the President:

"The President's opinion is that social and civil rights legislation has generally accomplished what it was intended to do and that it has greatly assisted in the admission of minority students and the recruitment of minorities for college employment. The principal impetus for social change, however, was brought about largely by pressure from students (minority and non-minority) and, to a lesser extent, pressures from faculty and staff. These pressures brought college employment and admissions standards into confluence with the general changes in society. While federal and state legislation undoubtedly smoothed the way for the process of social change to take place, the principal pressure for change has been from society itself, not from legislation. Legislation has thus been a product of the times. It has helped immeasurably to bring the thinking and attitudes of college administration in line with changing public attitudes but has not itself been the cause of change. The principal motivation for change has come from society. In this sense (without considering the mechanics of enforcement or the monitoring of programs by the federal compliance commissions), federal legislation has been productive and results have been beneficial rather than a hindrance to or an infringement on the freedom to manage college operations."

From the Vice President for Resources:

"In general, the Resource officers feel that government legislation and regulations have not been onerous, that they have not been difficult for the College to comply with, and that most of their purposes were valid. Most of these purposes have come within reasonable range of being accomplished. The Resources officers point out that administrative procedures in colleges are very difficult to change and that, in a few cases, legislation brought about changes very quickly."

OTHER LEGISLATION

While civil rights legislation and student aid funding received from government sources have by far the greatest effect on the College, there are a number of other items of legislation and regulations which have a bearing on College operations. A listing and at least a brief comment from an office affected are worth noting.

1. COPYRIGHTS. Comments from the Library and Biological Sciences:

"The Library has worked with copyright legislation for many years and the Librarian feels a commitment to the goals of this legislation. The need to interpret copyright law has been the biggest problem since it has not been written as clearly as could be hoped."

"The copyright law is something of a problem. The Chairman of the Biology Department says that the department has been xeroxing from journals and having the material duplicated for each student. Essentially the same thing happens with diagrams out of textbooks which they have made into slides for lectures. Some diagrams are redrawn on dittoes and handed out to students. At the beginning of the year in seminars there is a charge of $5.00 per student to cover xeroxing costs. The Chairman thinks that if the government were to clamp down on this practice, it would be a terrible hardship for academic institutions. She recommends special provisions for higher education."

2. HIGHER EDUCATION GENERAL INFORMATION SURVEY (HEGIS). Comment from the Registrar who coordinates Survey for Wellesley:

"The basic problem the Registrar finds with HEGIS is the way the report is structured, which makes it very arduous for the institution to respond. In addition, nine times out of ten the information is in a form in which it is not usable again. For about four years, the format was being changed every year so that any advance planning attempted in the collection of the necessary information was automatically obsolete. For instance, racial characteristics, previously a minority report every other year and now required every year, has been changed to include minority and non-resident alien reporting. (By 1979 this information will all be computerized.) To prepare this material is a two-to three-day project for the Registrar. Degrees and formal awards are now reported by racial/ethnic categories in the field of study, consuming another two days of the Registrar's time. The typing demands two days of support time. There is no offset on the time spent in terms of what might previously have been spent on AAUP studies, etc. Nor is HEGIS looking for the same material as the College except for segments of the fall enrollment reports.

"Any benefit to the College is negligible. The resulting "Projections of Educational Statistics to 1981-82", for instance, is not really up to date

although the time lag between the collection of material and publishing and distribution is improving. The latest edition, the 1975-76 edition, arrived in the spring of 1977. The Registrar has made relatively small use of the report even for planning purposes, but she thought that it might have some value for large state organizations."

3. OCCUPATIONAL SAFETY AND HEALTH ACT. Comments from Chemistry Department:

"In a non-civil rights area, the Occupational Safety and Health Act of 1970 has had considerable impact. Now that all the science departments are under a single roof, it is essential that they have common safety practices. (Previously the safety concerns were handled department by department, a reasonably satisfactory arrangement.) Because there was no published safety booklet which was satisfactory for our combined needs, members of the science departments have felt it necessary to issue our own booklet for everyone in science. Naturally, OSHA rules and regulations as they apply to us had to be incorporated. A large amount of time was spent trying to agree on safety practices in the Science Center. Eventually it became obvious that one person was going to have to assume responsibility for writing the booklet, incorporating and integrating standard practices suggested by various departments and OSHA."

4. TAX REFORM ACT OF 1969. Comment from Treasurer:

"Specific legislation which has had the most effect on the Treasurer's Office is probably the Tax Reform Act of 1969. This legislation caused the office to set up a separate investment pool for life income contracts and allowed Wellesley to set up unitrusts and annuity trusts which had not been available before. Although the Tax Reform Act of 1969 brought some additional work to the Treasurer's Office, it also assisted in the College's fund-raising program and in that respect has had a positive impact on the College."

5. SECURITIES AND EXCHANGE COMMISSION REGULATION. Comment from Treasurer:

"The other area in which government legislation has had an effect on the College's handling of gifts of

securities has to do with Securities and Exchange Commission regulations. The College sometimes receives closely held stock as a gift and, therefore, must comply with the provisions of SEC Rule 144 in the disposition of such stock. There are also other SEC regulations which, on occasion, must be complied with when closely held or other special categories of stock are given to the College. This does not impose much of a burden on the Treasurer's Office, and what burden there is is easily offset by the value of the gift stock received."

6. COMPREHENSIVE EMPLOYMENT AND TRAINING ACT (CETA). Comment from Women's Center:

"Under the Comprehensive Employment and Training Act, the Center had one person funded last year to do internships. The Director finds this potentially desirable legislation, depending upon the individual and the environment. There must be a realistic assessment of what the person will do and of the supervisory staff available. Otherwise, it can be a waste of time both for the person presumably being trained and for members of the staff."

7. FAIR LABOR STANDARDS ACT. Comment from Student Services:

"The Director found the Fair Labor Standards Act helpful in establishing an equitable salary for Heads of House. The minimum wage provision offered support for her argument that the previous salary level was completely inadequate. She does, however, find unfair the legislation that allows ten-month employees to collect unemployment compensation although having signed a contract for the following term of employment."

CONCERNS ABOUT PRESENT AND FUTURE LEGISLATION

In the course of the interviews, it became clear that there are a number of concerns in the College community about legislation and the role of the government in higher education.

One of the concerns which came up often was the question of government intervention in College administration and operation. Several comments from the participants in interviews are worth noting.

From the Chairman of the Board of Trustees:

"The Chairman noted that there is a great reluctance on the part of the Trustees of the College to depend on extensive federal funding, whether it be for research projects, College programs, or financing student aid. Much of the concern about extensive federal funding comes from uncertainty of the College's ability to maintain its position as a single-sex institution if it relies too heavily on federal or other government funding. The single-sex question aside, many Trustees feel strongly that the College must always be in a position to maintain its independence and, therefore, have been reluctant to accept any more federal funding than is necessary for fear of government encroachment on the administration of the College."

From the Treasurer:

"One of the aspects of governmental regulations and legislation which concerns the Trustees of the College is the possibility of the government becoming too authoritative and interfering with or infringing on the College's independence. Wellesley has in the past been managed so that it has not been dependent on government funding and, in a few cases, has leaned over backward to maintain this position. The Treasurer cites an example in the 1960's when the College had a Housing and Urban Development low-interest loan of approximately $1,000,000 to partially fund the construction of a new dormitory. During the 1960's this low-interest loan was paid off in about ten years (instead of the thirty-five years scheduled) in order to get the College out of government funding, even though, in the opinion of some Trustees, this was an unwise economic move. The College undoubtedly could have earned a higher rate of return on the funds it was using to pay back the loan than the rate of interest it was paying on the government loan.

"Trustees have had some apprehension about government intervention in College management, particularly with regard to investment earnings which might be construed to be unrelated business income. Specifically, the uneasiness is fostered by uncertainty as to what the government interpretation of unrelated business income might be. This has so far had no material effect on College operations although it may have caused a slight inhibition in the determination of investment policy. There is a feeling that the government, if it is heavily involved with College financing, might encroach on the management pre-

rogatives of the College. The potential threat of forcing institutions of higher education to go co-educational is one which worries the Trustees. A shift to a coed college from a women's college would change the whole approach from a fund-raising standpoint. This potential issue keeps the Trustees wary about the amount of financing which is provided by the government. The Treasurer mentioned that Massachusetts Commonwealth legislation, which requires that graduate education be made available to both men and women, was a factor in Wellesley's decision to drop its graduate program. He also noted that the policy of using government authority in one area in order to enforce requirements in an unrelated area is, at best, a dubious policy. For example, a year or two ago, HEW cut off funds from research projects at some universities in order to force these universities to produce what HEW judged to be acceptable affirmative action programs. The enforcement procedure was unrelated to the legislation being enforced. The Treasurer feels that this is questionable policy. There are further examples, small examples to be sure, of encroachment by the government in management policy. For example, the ERISA requirements made it necessary for Wellesley College to shift its pension plan investments from the College endowments to a separate trust, although this action would probably have been taken anyway."

<u>From the Resources Office</u>:

"Both the former and the current Resources Officer believe that the Board of Trustees' resistance to acceptance of government funds and the reservations about the College relying too heavily on government funds are outdated. This is not any longer a concern for Trustees. They both concede that there would perhaps still be considerable resistance if reliance on government funding were truly critical. But, Wellesley does not have much in the way of research funds coming from the government and would not be hurt if research funds were cut off. With the exception of financial aid to students, there is not enough government money from all sources coming to the College to cause apprehension about possible loss of funds. There has never been any objection to government assistance to students. While earlier in the College's history some Trustees raised questions about possible intervention or interference from the government, neither Officer has seen any evidence that there has ever been any problem of interference. They feel that that spectre has been largely dispelled and that Trustees no longer feel threatened by it."

From the Department of Political Science:

"The Chairman noted the extreme reluctance of Trustees in the 1960's to accept government funding. He cited as an example the prepayment of a million dollar low-interest Housing and Urban Development loan on a dormitory. The loan was paid off in ten years when the regular repayment schedule called for thirty-five. This kind of action cost the College a considerable amount of money because of the substantial difference between the Housing and Urban Development interest rate and the interest rate the College could have earned on the money used to pay off the loan. This action by the Trustees made the faculty (those who knew about it) angry because they considered it a needless waste of money. The attitude of the Trustees has become somewhat more liberal since.

"The Chairman feels that there has been a modicum of interference with people and the way things are done because of government regulations. However, he states that if you believe in things, you have to interfere with people in order to implement that belief, and people under those circumstances should not resent being interfered with. His general opinion is that government actions have been, in large part, beneficial to the College, and certainly have outweighed any disadvantages which might have been brought about by the necessity of compliance with regulations."

There were also several concerns expressed about possible future legislation. These also should be noted.

The Chairman of the Board of Trustees:

"The Chairman noted that the provisions of the Internal Revenue Service code which allow tax deductions for gifts to educational institutions have, of course, had an enormous effect on the operations of private colleges. Most of the recent IRS regulations have benefited colleges by making certain forms of gifts easier and by giving the donor a more favorable tax break. At independent colleges where about 50% of educational expense is covered by tuition and fees, the colleges are dependent on donations and in this sense government legislation (in the form of allowable tax deductions) has been essential for the colleges' existence. One continuous concern of independent colleges is that Congress might at some time limit

personal deductions for charitable and educational contributions which would reduce the incentive for donors to continue to make contributions to the colleges. Since any independent college is heavily dependent on donations from its benefactors, any such change in federal income tax provisions would have a serious impact on the college."

The Resources Office:

"The Resources Office is greatly concerned over any changes which might be forthcoming in Internal Revenue laws and regulations. The changes in treatment of capital gains being talked about by the Carter administration could cause major problems with donors if it is decided that capital gains are to be fully taxed. In this situation, people giving securities to the College would be unable to avoid the capital gains tax by giving appreciated securities to the College. This is probably the principal concern about possible Internal Revenue changes. The allowance of charitable deductions seems likely to continue without change."

The Treasurer:

"There is always new legislation pending which may also have a major effect on the College's operation. One spectre which haunts the Trustees and the administration of colleges is the elimination of the income tax deduction for donors to educational institutions which would, of course, be a disaster to college operations. On the other hand, favorable legislation may also be pending. An example is the elimination of double taxation of dividends. This would make it possible for corporations to pay larger dividends which would be highly beneficial to independent colleges since they are, up to now, tax exempt."

The President:

"In one final specific concern, the President expressed consternation over some colleges' suggestion of possible withdrawal from the Federal Social Security system. She believes strongly that colleges should remain in the Social Security system because she does not think that colleges or other institutions can

handle comparable retirement income programs by themselves."

A GENERAL SUMMING UP

It is hardly possible to sum up an impression of this complicated subject in a brief statement. Nevertheless, a positive feeling about the relations of government and College does come through from the interviews. It is perhaps best expressed in a paragraph from the President's interview.

> "In general, the President feels that federal legislation has had a positive effect on colleges from the standpoint of both social response and the provision of financial aid to students. This legislation has helped to bring the College quickly into harmony with the environment of the times when this otherwise would have happened very slowly, if at all. Again, it should be emphasized that legislation is a product of pressures for social change rather than a cause. It is difficult to place dollar values on the differences that federal legislation has made, because many of the costs related to federal programs are for activities, such as adequate personnel procedures, that should have been undertaken earlier but were not. In any case, the time, trouble and money expended (and yet to be expended) probably are worth it."

CONCLUSIONS AND RECOMMENDATIONS

In reviewing the interviews with key faculty and administration of Wellesley College, the highlights of which were presented in the preceding pages, it is possible to draw some general conclusions about government relations with Wellesley and the impact that government activities have had on the College. As a result of the self-study conducted over the past several months, the study team and the Committee come to the following conclusions:

CONCLUSIONS

1. Resources provided by the government far outstrip the costs of compliance. The College has received major capital funding as well as operating support. For the current fiscal year, the College is budgeted to receive over $1,500,000 in government funds for current operations.

2. While it is impossible to be precisely accurate about the cost of government programs to the College, there is sufficient information to make a reasonable estimate of costs. Estimated costs are:

Capital costs (since 1973)	$250,000
First-time implementation costs (since 1974)	126,000
Continuing annual expense of compliance	278,000
Annual cost of unemployment compensation	150,000

3. The economics seem clear. The College receives substantially greater funding than it is required to expend on government requirements. There is no substantial evidence that excessively wasteful or unduly expensive procedures are required.

4. There is no evidence of government interference in the policies or operation of the College at any level. Once awarded, federal monies require financial accountability and reasonable narrative reporting. They do not seek to dictate to decision-making activities.

5. However, for a single-sex institution the possibility of government interference remains. Because of the belief that a women's college provides a special contribution to the education and development of women, any change from the single-sex status of the College would alter the unique character and effectiveness of the College.

6. Government legislation and regulations are generally placed within the larger concept of social change and movement. They are seen both as manifestations of the social climate of the period and as a political response to the demands of the populace.

7. The College was well on the way to making many of the changes mandated by legislation well before the legislation was effective. Thus legislation and regulations were implementing factors rather than instigating factors. The cost of change is more a cost of social development than of compliance to government legislation.

8. The faculty feel somewhat burdened by the demands of the search process. It is particularly frustrating when efforts meet with little success in proportion to the time and energy expended. But the search process has kept faculty aware of the need to increase minority representation.

9. The character of the faculty has been modified by community desires and social pressures as manifested by affirmative action search requirements. Minority representation is now taken as a given, and as the minority base has expanded, less than honest efforts to increase the number of qualified minority members on the faculty are not acceptable.

10. Civil rights legislation has resulted in the recruiting and interviewing of a broader range of qualified candidates - minority and non-minority.

11. There is unanimity that the student population has changed from an essentially white Anglo-Saxon Protestant constituency to an ethnically and economically diversified group of young women. The impetus to change developed more from social pressure than from legislative mandate.

12. Government funding has made it possible for the College to greatly expand its financial aid programs which has allowed the private liberal arts college in turn to attract a heterogeneous student body. This would not have been possible without government funds. As educational costs escalate, federal funding becomes increasingly vital to both the financial and the social health of the College.

13. Proposed changes in the mandatory retirement age pose questions about the tenure system and the concomitant constraints on professional advancement for a number of junior faculty.

14. Legislation was solely responsible for Wellesley's dropping of graduate programs. The laws of the Commonwealth of Massachusetts made it impossible to continue to offer graduate programs and still remain a single-sex institution.

15. There is general agreement with the principles of the Buckley Amendment, but the legislation requires unwieldy and inflexible procedures. This needs to be modified.

16. Regulations on research on human subjects leave much to be desired although there is an indication that the fault may lie as much with the College as with the regulation. In any case, the guidelines need to be made more clear and the College needs to examine its own procedures.

RECOMMENDATIONS

From the observations and conclusions of the self-study, the Committee has the following recommendations for revisions and modifications in legislation and government practices.

1. We recommend that reporting requirements for compliance with government legislation be simplified and consolidated. Conflicting requirements should be eliminated, acceptable methods of obtaining information should be outlined, and standardized formats should be adopted. It would be profitable, as well, if all materials underwent a final screening process to determine the value of the information being requested. Documentation of compliance procedures, for instance, is sometimes unwieldy and ineffectual. HEW's Commission on Federal Paperwork has made a good start on reforms. Those efforts should be continued.

2. We urge that a plan for providing federal financial aid to students from middle-income families be developed. Colleges and universities have made attempts to handle this through

parent loan plans but this falls short of meeting the middle-class funding problem. Federal provisions for this segment of the economy will be increasingly important as educational costs continue to rise.

3. We recommend that federal aid to students be reoriented toward more assistance in the form of grants rather than loans. Recent emphasis has been heavily on loans to the point where the burden placed on students after graduation is disproportionate. This policy particularly places an unfair burden on the lower-income student. So long as women do not receive equal pay for equal work, they, too, share in this inequity.

4. Regulations to safeguard the rights of human subjects are in need of considerable clarification. We urge that specific guidelines be established for the full range of research activities to indicate more precisely what conditions are acceptable and what controls are necessary.

5. The strict enforcement of copyright laws as they presently exist would create many problems in the dissemination of instructional materials. We suggest that a special provision be made for educational institutions to ensure that access to published materials is in no way curtailed.

6. Although the objectives of the Buckley Amendment are not in question, the legislation itself should be open to review. We recommend that consideration be given to a redesign of the legislation if it is to become effective in the accomplishment of its intent.

7. We urge that any consideration of dropping the personal income tax deduction or the adoption of full taxation of capital gains be opposed so that institutions of higher education can continue to benefit from contributions, particularly of gifts of appreciated assets.

8. We support close government monitoring of affirmative action and civil rights legislation. Progress has been made and needs to be sustained.

APPENDIX 1

STUDY TEAM

Mrs. Elizabeth K. Bark, Budget Officer, Wellesley College
Mrs. Lucille M. Knight, Assistant to the Vice President for Financial and Business Affairs, Wellesley College
Mr. John W. Hartley, Vice President for Financial and Business Affairs, Wellesley College

ADVISORY COMMITTEE

Mrs. Elizabeth K. Bark, Budget Officer, Wellesley College
Mrs. Susan Fedo, Coordinator for Student Services and Director of Schneider Center, Wellesley College
Mr. John W. Hartley, Vice President for Financial and Business Affairs, Wellesley College
Mrs. Marguerite Hasbrouck, Administrator, College Relations, Wellesley College
Mrs. Lucille M. Knight, Assistant to the Vice President for Financial and Business Affairs, Wellesley College
Mrs. Karen Maxwell, Assistant to the Dean, Wellesley College
Mrs. Amy Nychis, Financial Aid Officer, Wellesley College
Miss Elizabeth J. Rock, Director of Science Center, Wellesley College
Mr. Edward Stettner, Associate Professor of Political Science, Wellesley College

wellesley college

office of the vice president
for
financial and business affairs

July 12, 1977

To: Administrative and Department Heads being asked to participate in Commission Study

From: John W. Hartley Jack Hartley

Dear Colleagues:

The Sloan Foundation has asked the College to participate in a study of the impact of federal legislation and regulations on colleges and universities. The participating institutions will provide case studies for a commission Sloan is forming to be called the Sloan Commission on Government and Higher Education. We have been asked to prepare our part of the project and return it by September 30.

Collection of data for the Study will be made by me, Mrs. Bark and Mrs. Knight but we have also formed an advisory committee, including the three of us, Susan Fedo, Marguerite Hasbrouck, Karen Maxwell, Amy Nychis, E. J. Rock and Edward Stettner to review the study procedures, the data collected, the conclusions drawn from the study, and the final report to be made to Sloan.

We would like to get a broad representation of views and experience throughout the campus and we would like you to participate. One of us will be interviewing you in the next several weeks to discuss with you how federal regulations and legislation have affected your operation.

I have enclosed a summary of the kinds of questions we will be asking you. I hope by sending this to you in advance, you will have had some time to think through your responses to these questions by the time we talk with you. We will discuss them in more detail, of course, when we see you.

Also enclosed is a summary of major federal legislation which we think has an effect on the College. If you know of other regulations or legislation which have had a major impact on the College, please include them in our discussion.

We will be contacting you shortly to set up an appointment for an interview. We will be very interested in hearing your responses to these questions. The Sloan Foundation thinks that this is an important project and will be making a substantial investment in the Commission. We also think it is important and will appreciate your giving this some serious thought and attention.

wellesley, massachusetts 02181

QUESTIONNAIRE

I. Specific legislation/regulations that affect office

A. From attached list, please identify those regulations or legislation that directly influence the operation of your office.

B. Please also identify those acts which indirectly but significantly affect your office.

C. Are there any other regulations or legislation which have a significant effect on your office?

II. Extent of impact on office

So far as possible, describe both the initial and the continuing effect of the listed regulations and legislation on your office in terms of:

A. Time
   1. How many staff members are involved? What is your estimate of time spent?
   2. What has been the effect on the structure of office
      a) Are additional personnel required?
      b) Has it been necessary to reorganize staff responsibilities?

B. Dollars
   1. What is the estimated expense to office? (e.g., added staff, record storage, large mailings, casual wages, etc.)
   2. What revenues have been received from government sources?
      a) What proportion of total resources does this represent?
      b) How important are these funds to financial health of office?
      c) What would be the effects of cut-off?

C. Programs
   1. What changes in existing programs have occurred because of regulations and legislation? (e.g., interview procedures, recruiting, curriculum, academic legislation, research guidelines, financial reporting.)

D. Persons

Where does greatest impact fall? Students, faculty, administrative staff?

   1. What are general attitudes toward and awareness of legislation?
   2. What has the effect been on the decision-making?

E. Evolution of impact on office
   1. What has been the growth - or diminishment - of federal or state authority in your department?
   2. Has this authority replaced other programs already existing in your office?
   3. What is future out look?

III. Evaluation of Compliance procedures

A. How successful are your efforts to comply with legislation?

B. Are there contradictory requirements or duplication of efforts?
   1. Intra-departmentally?
   2. Inter-departmentally?

C. Is there any specific legislation and/or regulation that presents unusual difficulties for your department?

D. Have departmental policies been changed to accommodate legislation?

E. Would you characterize your compliance procedures as perfunctory or as a genuine commitment to the goals of the regulations or legislation?

IV. Evaluation of results of legislation in relation to goals of legislation

A. Are your satisfied that the legislation does in fact achieve its purpose? In your opinion, is the purpose worthwhile?

B. Aside from cost in time and money, has any legislation had an adverse effect upon the goals of your office or the College?

C. Have there been unanticipated or tangential benefits resulting from any legislation?

V. Summary

A. What is your overall assessment of the effect of governmental regulations and legislation on Wellesley? Do you perceive any changes fundamental to the character of Wellesley? Would the changes have resulted from general social trends apart from specific federal authority?

B. Are there any other comments you wish to make?

Federal Actions

Affecting Wellesley College

Following is a very brief summary of major federal statutes, executive orders, and regulations which have varying degrees of impact on the activities of academic and administrative departments at Wellesley College. In addition, a Sloan Commission report lists over four hundred higher education grant programs supported by the federal government, each with its own particular regulations.

I. Civil Rights Legislation/Rulings

1. Title VII of the Civil Rights Act of 1964, amended 1972.
   Bars discrimination on bases of race, color, religion, sex or national origin in terms or conditions of employment.

2. Executive Order 11246 and Revised Order #4
   Requires written affirmative action program if government contractor, including workforce and utilization analysis, goals for remedying deficiencies.

3. Title IX of the Education Amendments of 1972
   Bars sex discrimination in education programs and activities.

4. Equal Pay Act of 1963 (Amendments of Fair Labor Standards Act)
   Mandates equal pay for equal work.

5. Rehabilitation Act of 1973, Section 503
   Requires affirmative action to employ and advance handicapped persons as condition of federal contracts.

6. Family Educational Rights and Privacy Act of 1974 (Buckley Amendment)
   Denies funds to educational institutions who do not grant to parents or to student 18 or older the right to inspect and review records and files related to the student to contest accuracy of information therein. Also restricts release of such data.

7. Age Discrimination in Employment Act of 1967
   Prohibits discrimination in employment on basis of age, covers individuals between ages of forty and sixty-five.

8. Regulations for Research on Human Subjects
   Requires an Institutional Review Board to review and approve activities supported by DHEW grants on contracts in which human subjects are "at risk." The rights and welfare of subjects must be protected, the risk must be outweighed by benefit to subject and importance of knowledge gained, and legally effective informed consent must be obtained.

II. Non-Civil Rights Legislation/Regulation

1. Internal Revenue Code of 1954, Section 501(c)(3)
   Exempts from taxation "corporations.....organized and operated exclusively for religious, charitable, scientific, ..., or educational purposes...."

2. Social Security Act
   Provides for F.I.C.A. deductions from employees' pay and equal contributions from employer. Amount of pay on which deductions are based as well as percent of deduction subject to change.

3. Employee Retirement Income Security Act of 1974
   Sets standards for participation, vesting and funding of pension plans under Treasury Department, for reporting, disclosure, plan insurance under Labor Department. Title IV of the Act created the Pension Benefit Guaranty Corporation to oversee certain funding requirements, greater fiduciary accountability and liability, plan description requirements and other changes in employee benefit plans.

4. Architectural Barrier Act of 1968
   Requires that every building designed, contructed or altered after September 2, 1969 conform to the minimum standards in the "American Standard Specifications for Making Buildings and Facilities Accessible to, and usable by, the Physically Handicapped."

5. Occupational Safety and Health Act of 1970
   Created to establish and enforce safety and health standards nationwide for all business enterprises.

6. Internal Revenue Code of 1954, Section 170
   Defines and limits tax deductions for charitable gifts.

7. Tax Reform Act of 1976
   Liberalized permissible legislative activity and stated that declaratory judgment relating to exempt status of an organization has force and effect of decision of Tax Court or a final decree of district court or Court of Claims and is reviewable.

8. Fair Labor Standards Act of 1938 as amended 1966 and 1974
   Provides for payment of minimum wage, equal pay, overtime and sets child labor standards. Related acts: Walsh-Healey, Davis-Bacon, Arts and Humanities Act

9. Health Maintenance Organizations Act of 1973
   Requires an employer subject to minimum wage provisions of FLSA who has reveived written request for inclusion in the employer's health benefits plan from one or more qualified health maintenance organizations which operates in an area in which any eligible employee resides to offer option of membership in such to its eligible employees.

10. Higher Education General Information Survey

Requires statistical reporting of many areas of College activities such as institutional characteristics, students, finance, faculty, libraries, and continuing education.

11. Comprehensive Employment and Training Act of 1973 as amended

Provide job training and employment opportunities for economically disadvantaged, unemployed and under-employed persons. Act is comprised of seven titles and includes grant programs at institutions of higher education.

12. Immigration and Naturalization Act of 1891

Permits district directors of Immigration and Naturalization Service to accept a bond on behalf of alien prior to issuing visa, describes necessary forms and refers to section governing procedures for admission of students and faculty members.

13. Intergovernmental Personnel Act of 1970

Authorizes temporary assignment of employees between executive agencies and states, local governments and institutions of higher education. Gives rules governing investigations of civilians working for federal agencies, volunteers under federal agency supervision, volunteers representing U. S. government or agency or persons having access to federal materials.

14. Animal Welfare Act of 1970 as amended

Provides for the humane treatment of laboratory animals. Regulations cover all aspects of animal welfare including transportation, housing, etc.

15. Non-profit Mail

Second and third class mail regulations as well as those governing permit imprints and precancelled stamps are listed in chapter one of the Postal Service Manual.

16. Hazardous Substances

There exist diverse requirements concerning the transportation and storage of hazardous substances regulated by a variety of agencies and departments depending on the nature of the substance. Some of the enforcing agencies or departments are: Environmental Protection Agency, Food and Drug Administration, Drug Enforcement Administration, Nuclear Regulatory Commission.

17. Surplus Property

Acquisition and use of surplus property is regulated by agency or department which has declared it surplus.

18. Campus Radio Stations

Requirements governing use of AM and FM educational broadcasting facilities prohibit advertising, regulate hours of broadcasting, frequency of announcement of sponsors, etc.

19. Collective Bargaining Agreements

Rights of workers to organize for purpose of negotiating terms and conditions of employment protected by the National Labor Relations Act. National Labor Relations Board has jurisdiction over college organizing activities and labor disputes.

20. Copyright Law

Regulations governing use, reproduction and distribution of copyrighted material.

III. Regulations and Legislation Relating To Finances and Funding

1. Title IV of the Higher Education Act of 1965 as amended
Provides for low-interest loans to vocational students and students in institutions of higher education. In addition to general provisions for student eligibility, there are provisions for instructional eligibility, required procedures, record-keeping, and reporting.

Provides for College Work-Study Program with specific criteria for funding and administration.

Authorizes the Basic Educational Opportunity Grant Program "to assist in making available the benefits of post secondary education to eligible students by providing assistance in meeting the cost of such education."

Title I of the Higher Education Act of 1965 as amended
Provides for Supplemental Educational Opportunity Grants "to assist in making available the benefits of post-secondary education to qualified students who, for lack of financial means of their own or their families, would be unable to obtain such benefits without such a grant."

2. Council on Wage and Price Stability

Principal functions include the monitoring of wage and price activity in the private sector, encouragement of restraint in such activity, and review of federal agency programs for inflationary impact on economy.

JWH 7/11/77

APPENDIX 3

INTERVIEWEES

Mrs. Mary Ellen Ames, Director of Admissions, Wellesley College
Mrs. Elizabeth Bark, Budget Officer, Wellesley College
Miss Elizabeth Blake, Dean of Academic Programs, Wellesley College
Miss Helen Brown, Librarian, Wellesley College
Mr. Peter Buchanan, Vice President for Resources, Wellesley College
Mrs. Maud Chaplin, Associate Dean and Assistant to the President, Wellesley College
Mr. Albert M. Coffey, Director of Physical Plant, Wellesley College
Mrs. Mary D. Coyne, Chairman of Biological Sciences Department, Wellesley College
Miss Jean Crawford, Chairman of Chemistry Department, Wellesley College
Mr. Nelson Darling, Chairman of the Board of Trustees, Wellesley College
Ms. Carolyn Elliott, Director of Center for Research on Women in Higher Education and the Professions, Wellesley College
Mrs. Susan Fedo, Coordinator for Student Services and Director of Schneider Center, Wellesley College
Mr. Marshall Goldman, Professor, Economics Department, Wellesley College
Mrs. Janet Guernsey, Chairman of Physics Department, Wellesley College
Mr. John W. Hartley, Vice President for Financial and Business Affairs, Wellesley College
Mr. Albert Holland, Former Vice President for Resources, Wellesley College
Mrs. Alice Ilchman, Dean of the College, Wellesley College
Mr. Harry B. Jones, Controller, Wellesley College
Mr. Rodney Morrison, Chairman of Economics Department, Wellesley College
Mrs. Barbara W. Newell, President of Wellesley College
Mrs. Amy Nychis, Financial Aid Officer, Wellesley College
Miss Alla O'Brien, Vice President for College Relations, Wellesley College
Miss Jacqueline Pollard, Director of Personnel, Wellesley College
Miss Elizabeth J. Rock, Director of Science Center, Wellesley College
Mrs. Eleanore Silverman, Registrar, Wellesley College
Mr. John Spring, Treasurer of Wellesley College
Mr. Edward Stettner, Associate Professor and Chairman of Political Science Department, Wellesley College
Miss Linda Vaughan, Chairman of Physical Education Department, Wellesley College
Ms. Joyce Wadlington, Director of Residence, Wellesley College
Ms. Barbara Wilson, Director of Career Services, Wellesley College